Hearing Date and Time: May 12, 2010, at 10:00 a.m. ET Objection Deadline: May 3, 2010 at 4:00 p.m. ET

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Attorneys for Libyan Arab Foreign Investment Company

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

|  | X | Chapter 11 Case No:    |
|--|---|------------------------|
| In re:                                 | : | 08-13555 (JMP)         |
|  | : |                        |
| LEHMAN BROTHERS HOLDINGS, INC., et al. | : | (Jointly Administered) |
|  | : |                        |
|  | : |                        |
| Debtor.                                | : |                        |
|  | X |                        |

## LIMITED RESPONSE OF LIBYAN ARAB FOREIGN INVESTMENT COMPANY TO DEBTOR'S SIXTH OMNIBUS OBJECTIONS TO CLAIMS

Libyan Arab Foreign Investment Company ("<u>LAFICO</u>"), by and through its undersigned counsel, hereby responds to the Sixth Omnibus Objection to Claims (Amended and Superseded Claims) (the "<u>Objection</u>") filed by Lehman Brothers Holdings Inc. and its affiliated debtors (collectively, the "<u>Debtors</u>"), and respectfully states as follows:

08-13555-mg Doc 8609 Filed 04/23/10 Entered 04/23/10 11:31:08 Main Document Pg 2 of 3

1. On September 22, 2009, LAFICO timely filed a proof of claim in the

amount of \$27,444,941.53 (Claim No. 30376) (the "Original Claim").

2. On November 2, 2009, LAFICO filed an amended claim in the reduced

amount of \$27,051,904.50 (Claim No. 62522) (the "Amended Claim").

3. On April 1, 2010, the Debtors filed the Objection pursuant to the Court's

order approving procedures for the filing of omnibus objections to proofs of claim.

Among other things, the Debtors seek to disallow and expunge the Original Claim filed

by LAFICO on the basis that it has been superseded by the Amended Claim.

4. LAFICO does not object to expunging and disallowing the Original Claim

because such claim has in fact been superseded by the Amended Claim, which relates

back to the date of filing of the Original Claim. However, LAFICO expressly preserves

all rights, claims, interests, remedies and defenses with respect to the Amended Claim,

and such other rights, claims, interests, remedies and defenses that LAFICO may now

have or at any time hereafter may assert against the Debtors, or any other debtor, entity or

person, and any property held by the Debtors or any such other debtor, entity or person.

Respectfully submitted,

DATED: APRIL 23, 2010

FOLEY & LARDNER LLP

/s/ Douglas E. Spelfogel

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